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April 27, 2015

VIA ELECTRONIC CASE FILING (ECF) AND E-MAIL

The Honorable Katherine B. Forrest
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, New York 10007

Re: *Peter Wengryn, et al. v. American Business Consultant Group Holding, LLC,*
et al.

Docket No.: 13-CV-4556 (KBF)

Dear Judge Forrest:

This firm represents Plaintiffs Peter Wengryn, Laila Sayad and Gerry Louw (collectively, "Plaintiffs") in the above-referenced matter. We are in receipt of Your Honor's April 23, 2015 Order granting Defendants an extension of time in which to respond to Plaintiffs' Motion for Partial Summary Judgment.

In light of the new date on which Defendants' Response is now due, and with the consent of my adversary, Eric Creizman, Esq., I am writing to respectfully request a one-week extension of time in which to submit Plaintiffs' Reply in Support of Their Motion for Partial Summary Judgment. Pursuant to the Court's original Scheduling Order, Plaintiffs' Reply was initially due today, April 27, 2015, which is the same date on which Defendants' Response is now due. In light of the foregoing, Plaintiffs respectfully request that the Court please amend its Scheduling Order to provide a new Reply due date of Monday, May 11, 2015, representing a two (2) week period (instead of the original one-week period) for Plaintiffs to review and respond to Defendants' submissions.

I respectfully request this extension due to previous litigation requirements and commitments, as well as personal commitments, that had been scheduled for this week, when I believed that I would be receiving Defendants' Response Brief last Monday, April 20, 2015, and that I would be filing Plaintiffs' Reply Brief today, April 27, 2015. Unfortunately, these previous requirements and commitments will make it impossible to file Plaintiffs' Reply Brief within the 7-day time period provided by the Court's original Scheduling Order, given the new date for the submission of Defendants' Response.

Please know that Plaintiffs have not requested any prior extensions of time in which to file Plaintiffs' Motion for Partial Summary Judgment, and/or Plaintiffs' Reply in Support of Their Motion for Partial Summary Judgment.

We thank Your Honor for the Court's consideration in this regard. Should you have any questions, please feel free to contact me.

Respectfully submitted,

BELL, SHIVAS & FASOLO, P.C.

By: /s/ Valerie Fasolo
Valerie Fasolo, Esq.
Attorneys for Plaintiffs

cc: Eric M. Creizman, Esq.